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June 7, 2024

**VIA CM/ECF ONLY**

Hon. Jose R. Almonte, U.S.M.J.  
Martin Luther King Building &  
U.S. Courthouse  
Court Room PO 9  
50 Walnut Street  
Newark, NJ 07101

**Re: Lorenzo v. Borough of Palisades Park, et al.  
Civil Action No. 23-21849 (CCC-JRA)**

Dear Judge Almonte:

This Firm represents Defendants Stephanie S. Jang and Jae Park in the above-referenced matter. We are in receipt of a motion for extension of time to file a responsive pleading filed by Defendants Borough of Palisades Park, Chong Paul Kim, and Suk Min (collectively, the “Borough Defendants”). In addition, we are in receipt of a letter from plaintiff’s counsel seeking to consolidate this matter with another case, *Ashley v. Borough of Palisades Park, et al.*, Civil Action No. 22-6285 (CCC-JRA), and then putting together a single briefing schedule to deal with any motions.

We write to join in the Borough Defendants’ application for an extension of time. While we take no position on whether the *Ashley* matter should be consolidated with this one (we don’t represent anyone in that matter as of now), if this Court believes consolidation is appropriate, we do believe a single briefing schedule would be advisable.

If Your Honor has any questions or concerns, please contact me. Thank you.

Respectfully submitted,

***/s/Roshan D. Shah***

ROSHAN D. SHAH, ESQ.  
For the Firm

c: All Counsel of Record